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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

William Christopher Carmody
 (admitted *pro hac vice*)
 Shawn J. Rabin (admitted *pro hac vice*)
 Steven M. Shepard (admitted *pro hac vice*)
 Alexander Frawley (admitted *pro hac vice*)
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Case No.: 4:20-cv-03664-YGR-SVK

**PLAINTIFFS' ADMINISTRATIVE
 MOTION TO SUPPLEMENT THEIR
 SANCTIONS MOTION**

The Honorable Susan van Keulen

Pursuant to Local Rule 7-11, Plaintiffs respectfully seek leave to file a two-page supplement to their Sanctions Motion (Dkt. 430). This proposed supplement addresses (1) Google's May 12, 2022 supplemental response to Interrogatory No. 35, which discusses the maybe_chrome_incognito, is_chrome_incognito, and is_chrome_non_incognito bits, and (2) Google's April 25, 2022 Declaration of Richard Harting (Dkt. 559-1). Consistent with the relief Plaintiffs seek in their Sanctions Motion, the proposed supplement explains why Google should not be permitted to rely on this belatedly produced information.

The proposed supplement is attached as Exhibit A to the Declaration of Mark Mao, concurrently filed herewith. Google's supplemental response to Interrogatory No. 35 is attached as Exhibit B to the Declaration of Mark Mao.

The Court should permit Plaintiffs to file this supplement because it addresses material that Google provided *after* the April 21, 2022 hearing on Plaintiffs' Sanctions Motion. *See Goodwin v. John*, 2020 WL 6947690, at *1 (D. Nev. Sept. 21, 2020) (granting leave "to file supplemental briefs" to "address" material obtained "while the motion was pending").

Plaintiffs reached out to Google to seek its position on this motion. As of this filing, Google has not yet taken a position. Mao Decl. ¶ 7.

Dated: May 16, 2022

Respectfully submitted,

By: /s/ Mark Mao

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